

DOCKET NO. : FST CV15 50148-08 S : SUPERIOR COURT
WILLIAM A. LOMAS : J.D. OF STAMFORD/NORWALK
VS. : AT STAMFORD
PARTNER WEALTH MANAGEMENT, LLC :
ET AL. : MAY 9, 2016

PARTIES' JOINT MOTION TO MODIFY SCHEDULING ORDER

The Plaintiffs and Defendants in the above-referenced matter hereby jointly move the Court for a modification of certain deadlines as set forth in the current Stipulation and [Proposed] Scheduling Order attached hereto as ***Exhibit A***.

THE DEFENDANTS,

BY 

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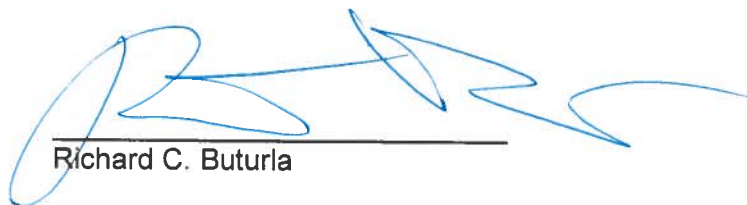
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CERTIFICATION

This is to certify that a copy of the foregoing has been mailed, postage prepaid, on the
date hereon to:

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EXHIBIT A

DOCKET NO.: FST CF 15-5014808-S) SUPERIOR COURT
)
WILLIAM A. LOMAS,) JUDICIAL DISTRICT OF
) STAMFORD/NORWALK
Plaintiff,)
)
versus) AT STAMFORD
)
PARTNER WEALTH MANAGEMENT, LLC et)
al.)
)
Defendants.)
)

STIPULATION AND [PROPOSED] SCHEDULING ORDER

WHEREAS, due to good faith settlement efforts, the parties in the above-captioned action have not completed discovery as contemplated by the Scheduling Order entered in this case on October 29, 2015 (the "Original Scheduling Order"); and

WHEREAS, the parties to desire to conduct discovery in this case in an orderly manner without affecting the trial date;

THE PARTIES HERETO AGREE, SUBJECT TO COURT APPROVAL, AS FOLLOWS:

1. The date set for jury selection shall remain November 9, 2016 (the "Trial Date").
2. The time to serve written discovery requests, including document requests and interrogatories, is hereby extended until and including June 10, 2016, provided that any new written discovery requests are limited to claims, defenses, or factual allegations not previously in the case as of October 30, 2015.
3. Responses and objections, if any, to written discovery served pursuant to paragraph 2 above shall be due within 30 days of service of a set of discovery requests.
4. Requests for admission may be served up to 90 days before the Trial Date and

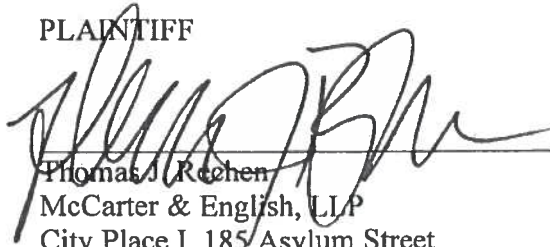
responses and objections, if any, shall be due within 30 days of service.

5. The parties shall disclose their experts by July 1, 2016.

6. Dispositive Motions: (a) moving papers shall be submitted to the Court by May 27, 2016, (b) opposition papers shall be submitted by June 20, 2016, and (c) reply papers shall be submitted by July 1, 2016. All dispositive motions shall be marked ready on the short calendar no later than July 1, 2016.

7. The parties will conduct fact and expert depositions on dates to be mutually agreed upon, with all depositions to be completed by no later than September 2, 2016. Any party opposing a motion for summary judgment shall have the right to take one or more depositions prior to the date for filing opposition papers as such party, in good faith, believes are necessary to properly defend such motion.

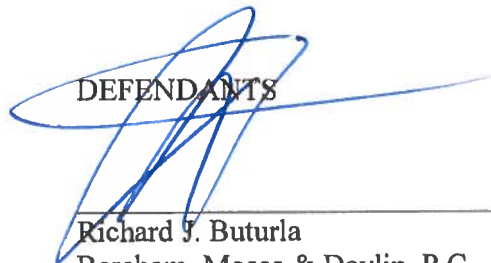
PLAINTIFF



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Dated: May 9, 2016

DEFENDANTS



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-and-

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Dated: May 9, 2016

SO ORDERED THIS _____ day of _____, 2016.